REMARKS/ARGUMENTS

Favorable reconsideration of this application as presently amended and in light of the following discussion is respectfully requested.

Claims 1, 3-9, 11-48, 50, 51, 53-77, 79-82, 85, 87, and 90 are pending in this application. Claims 1, 48, 53, 58, 61-63, 65, 67-70, 74, 80, 82, 85, 87, and 90 are amended and Claims 83, 86, and 88 are canceled by the present amendment.

Amendments to the claims find support in the application as originally filed. Thus, no new matter is added.

In the outstanding Office Action, Claims 1 and 48 were objected to; Claim 1 was rejected under 35 U.S.C. § 112, second paragraph; Claims 1, 3-9, 11-26, 30, 31, 36-38, 44, 45, 48, 50, 51, 53-68, 70, 71, 75, 77, 80-83, 85-88, and 90 were rejected under 35 U.S.C. § 103(a) as unpatentable over U.S. Patent 6,185,413 to Mueller et al. (herein "Mueller") in view of U.S. Patent 6,101,379 to Rahman et al. (herein "Rahman") and U.S. Patent 6,151,500 to Cardina et al. (herein "Cardina"); Claims 27-29, 39, 67-69, and 76 were rejected under 35 U.S.C. § 103(a) as unpatentable over Mueller, Rahman, Cardina, and U.S. Patent 6,427,076 to Skog; Claims 32-35 and 79 were rejected under 35 U.S.C. § 103(a) as unpatentable over Mueller, Rahman, Cardina, and U.S. Patent 6,014,546 to Georges; and Claims 40-43, 46, 47, and 72-74 were rejected under 35 U.S.C. § 103(a) as unpatentable over Mueller, Rahman, Cardina, and U.S. Patent 6,122,263 to Dahlin et al. (herein "Dahlin").

Regarding the objection to the claims, Claims 1 and 48 are amended to recite that each preferred route code identifies a mobile network service provider and a land line network service provider and to further indicate that the mobile network service provider is identified by a selected preferred route code. Thus, it is respectfully requested the objections to Claims 1 and 48 be withdrawn.

Regarding the rejection under 35 U.S.C. § 112, second paragraph, Applicant respectfully submits that amendments to Claim 1 address the issues raised in the Office Action. Accordingly, it is respectfully requested the rejection under 35 U.S.C. § 112, second paragraph, be withdrawn.

Applicant respectfully traverses the rejection of Claims 1, 3-9, 11-26, 30, 31, 36-38, 44, 45, 48, 50, 51, 53-68, 70, 71, 75, 77, 80-83, 85-88, and 90 under 35 U.S.C. § 103(a), with respect to amended independent Claims 1, 48, 85, and 87.

Claim 1 is directed to a method of operating a mobile telephone in a cellular telephone communications system including a plurality of mobile network service providers and a plurality of land line network service providers. The method includes, in part, storing preferred route codes in a look-up table of the mobile telephone. Each of the preferred route codes identifies a mobile network service provider and a land line network service provider to be used to route a call to a corresponding call destination. The mobile network service provider and the land line network service provider correspond to the call destination based on results of a route selection decision by a control center remote from the mobile telephone. The method also includes originating an outgoing telephone call to a call destination by the input of user generated call destination information. Further, the method includes accessing the look-up table using an address determined at least in part by the user generated call destination information to obtain a selected preferred route code that corresponds to the call destination, and selecting a communication channel of the mobile network service provider identified by the selected preferred route code. In addition, the method includes transmitting the selected preferred route code via the selected communication channel to establish communication for the outgoing telephone call to the call destination corresponding to the user generated call destination information. Independent Claims 48, 85, and 87 include steps performing similar functions.

Applicant's Figure 1 is a non-limiting example of a method of operating a mobile telephone 1 in a cellular telephone communications system that includes plural mobile network service providers (e.g., represented by different base stations 4a, 4b, and 4c, each connected to a corresponding mobile telephone network 8a, 8b, and 8c, respectively) and a plurality of land line network service providers (e.g., represented by conventional telephone networks 5a, 5b, and 5c, as well as local exchanges represented by 6a, 6b, and 6c). In this example, the mobile telephone 1 includes a least cost route table 3 (e.g., a look-up table) that includes preferred route codes that identify a mobile network service provider and a land line network service provider to be used when making a call to a corresponding call destination. For example, the preferred route code includes information identifying one of the mobile telephone networks 8a, 8b, and 8c, as well as a land line network service provider which is one of 5a, 5b, and 5c for onward routing of a particular telephone call to a particular telephone call destination (e.g., telephone 2). The preferred route codes and the least cost route table 3 include information prepared in a route selection decision made by a control center remote from the mobile telephone.

Thus, the mobile telephone 1 of this example is able to make a telephone call at a lowest cost without having to include processing resources or processing power necessary to determine the optimum route from the mobile telephone. Instead, the mobile telephone is advantageously provided with a table of routing information that identifies the mobile network service provider and the land line network service provider to be used in a call to a particular call destination.

Applicant respectfully submits that Mueller, Rahman, and Cardina, whether taken individually or in combination, fail to teach or suggest each of the features of each of the independent claims. For example, it is respectfully submitted that the references fail to teach or suggest storing preferred route codes in a look-up table where each of the route codes

identifies plural service providers, a mobile network service provider and a land line network service provider, to be used to route a call to a corresponding call destination. Further, it is respectfully submitted that the references fail to teach or suggest basing the preferred route codes, which identify the mobile network service provider and the land line network service provider for a destination, on a route selection decision by a control center remote from the mobile telephone. Further, it is respectfully submitted that the references fail to teach or suggest transmitting a selected preferred route code (including identification of two service providers) to establish a call that uses the mobile network service provider and the land line network service provider identified by the selected preferred route code, and to establish the call to a call destination corresponding to user generated call destination information.

Mueller describes a mobile station that includes a selection device that calculates expected charges for a desired connection for each of plural "applications" which are being considered for a transmission connection.[1] According to Mueller, after the most cost efficient "application" has been selected, the desired transmission is carried out in accordance with the mobile radio network status corresponding to the selected "application," where the term "application" designates an individual access authorization to a mobile radio network or a service provider within a mobile radio network.[2] Further, Mueller indicates that "applications" are stored in a memory 8.

In other words, Mueller indicates that a mobile telephone includes a memory (e.g., lookup table) that stores "applications" which identify individual mobile radio network service providers and the mobile telephone performs an analysis to select a lowest cost one of the mobile radio network providers. However, Mueller fails to indicate that the application identifies a mobile network service provider and a land line network service provider to be used to route a call to a corresponding call destination. That is, Mueller selects a preferred

[1] Mueller at Appendix.
[2] Mueller at column 6, lines 18-22, and column 8, lines 62-67.

application from available networks by calculating which network has a preferred cost based on an entered call destination number, and therefore, Mueller does not store in a look-up table a list of call destinations that correspond to network service providers for various call destinations. Thus, it is respectfully submitted that Mueller fails to teach or suggest "storing preferred route codes in a look-up table ... identifying a mobile network service provider and a land line network service provider to be used to route a call to a corresponding call destination," as recited in independent Claim 1, and as similarly recited in independent Claims 48, 85, and 87.

Cardina describes a method that allows a user to receive a wireless telephone call at a home or other predetermined fixed location in the manner of typical wireline service.[3] According to Cardina, if a caller knows only the user's wireless number and is unaware of the user's wireline directory number, the system of Cardina provides the capability of forwarding the wireless call to the user's wireline directory number.[4] For example, Cardina indicates that a subscribing user may specify that an inbound communication that is initially directed to a cell phone 38 should be forwarded to a wireline unit 18 so the user may accept the communication as a call in the wireline system rather than the wireless system.[5]

In other words, Cardina indicates that a call made to a subscriber's mobile telephone having a first call destination number is forwarded to a land line phone number that is different than the call destination entered by the party dialing the number, and Cardina only indicates that the call is forwarded to a "directory number associated with his wireline units 18."[6] Thus, the system of Cardina can re-route a call to a wireless number to a different land line phone number, but Cardina is silent regarding a particular land line network service provider to be used to route the call. Therefore, Cardina also fails to teach or suggest storing

[3] Cardina at column 3, lines 41-44.
[4] Cardina at column 3, lines 63-65 and column 6, lines 40-48.
[5] Cardina at column 11, lines 16-20.
[6] Cardina at column 11, lines 15-16.

preferred route codes that include at least two different service providers used to route a call to a call destination. Accordingly, it is respectfully submitted that Mueller and Cardina fail to teach or suggest "storing preferred route codes ... identifying a mobile network service provider and a land line network service provider to be used to route a call to a corresponding call destination," as recited in independent Claim 1, and as similarly recited in independent Claims 48, 85, and 87. Further, it is respectfully submitted that the other references identified in the Office Action also fail to teach or suggest that feature.

In addition, it is respectfully submitted that the references in the Office Action fail to teach or suggest storing preferred route codes identifying two service providers where the route codes are based on results of a route selection decision by a control center remote from the mobile telephone. Rahman describes a method for acquiring potential tariff charges assessed by wireless service providers to a mobile subscriber prior to registration, calculating the potential tariff charges for the subscriber at a central location (at a MSC, mobile switching center) and sending appropriate tariff information to the mobile telephone from a candidate operator (e.g., mobile network service provider).[7] Then, according to Rahman, the mobile telephone can register with the lowest cost provider.[8]

In other words, Rahman indicates that an MSC (e.g., control center remote from the mobile telephone) calculates tariff charges and allows registration procedures to be initiated automatically with a lowest cost mobile network service provider. Thus, Rahman merely indicates that an MSC selects one of plural mobile network service providers to be used for a call. However, it is respectfully submitted that Rahman fails to teach or suggest preferred route codes that are based on a route selection decision by the control center remote from the mobile telephone where the preferred route codes identify two service providers: a mobile network service provider and a land line network service provider. Accordingly, it is

[7] Rahman at Abstract, column 3, lines 55-59, and column 4, lines 18-25.
[8] Rahman at column 4, lines 27-29.

respectfully submitted that Rahman fails to teach or suggest preferred route codes that are "based on results of a route selection decision by a control center remote from the mobile telephone" where the preferred route codes identify "a mobile network service provider and a land line network service provider," as recited in independent Claim 1, and as similarly recited in independent Claims 48, 85, and 87. Further, it is respectfully submitted that the other references in the Office Action also fail to teach or suggest that feature.

In addition, it is respectfully submitted that the references in the Office Action fail to teach or suggest establishing a call to a call destination corresponding to user generated call destination information via two service providers that are identified by a selected preferred route code by transmitting the selected referred route code. As discussed above, the references in the Office Action fail to teach or suggest storing preferred route codes that identify a mobile network service provider and a land line network service provider corresponding to a call destination. Further, it is respectfully submitted that the references also fail to teach or suggest establishing a call via a mobile network service provider and a land line network service provider by transmitting the selected preferred route code identifying those service providers via a communication channel of the mobile network service provider.

As discussed above, Rahman describes a system that forwards a call directed to a mobile telephone to a land line number. Thus, Rahman receives a mobile telephone call via a communication channel and determines a land line number based on stored information. Thus, assuming *arguendo* that the land line number corresponds to a land line network service provider, the land line network service provider is not identified in any preferred route code that is transmitted to the system of Rahman to establish the call (i.e., the calling user is unaware of the forwarded call destination). Accordingly, it is respectfully submitted that Rahman fails to teach or suggest transmitting the selected preferred route code, which

identifies a mobile network service provider and a land line network service provider, via a selected communication channel of the mobile network service provider in the selected preferred route code to establish a call via the mobile network service provider and the land line network service provider. Thus, it is respectfully submitted that Rahman whether taken alone or in combination with other references in the Office Action fails to teach or suggest "transmitting the selected preferred route code via the selected communication channel to establish communication for the outgoing telephone call to the call destination corresponding to the user generated call destination information via the mobile network service provider and the land line network service provider identified by the selected preferred route code," as recited in independent Claim 1, and as similarly recited in independent Claims 48, 85, and 87.

Therefore, at least for each of the reasons discussed above, it is respectfully submitted that independent Claims 1, 48, 85, and 87, and claims depending therefrom, patentably define over Mueller, Rahman, and Cardina.

Accordingly, it is respectfully requested the rejection of Claims 1, 3-9, 11-26, 30, 31, 36-38, 44, 45, 48, 50, 51, 53-68, 70, 71, 75, 77, 80-83, 85-88, and 90 under 35 U.S.C. § 103(a) be withdrawn.

Moreover, Applicant respectfully traverses the rejections of Claims 27-29, 32-35, 39-43, 46, 47, 67-69, 72-74, 76, and 79 under 35 U.S.C. § 103(a) as unpatentable over Mueller, Rahman, Cardina, Dahlin, Georges, and/or Skog.

Claims 27-29, 32-35, 39-43, 46, 47, 67-69, 72-74, 76, and 79 depend from independent Claims 1, 48, 85, or 87, which as discussed above are believed to patentably define over Mueller, Rahman, and Cardina. Further, it is respectfully submitted that Skog, Georges, and Dahlin, whether taken individually or in combination, fail to supply the claimed features lacking in the disclosures of Mueller, Rahman, and Cardina. Accordingly, it is respectfully requested those rejections under 35 U.S.C. § 103(a) also be withdrawn.

Accordingly, it is respectfully submitted that independent Claims 1, 48, 85, and 87, and claims depending therefrom, are allowable.

Consequently, in light of the above discussion and in view of the present amendment this application is believed to be in condition for allowance and an early and favorable action to that effect is respectfully requested.

Respectfully submitted,

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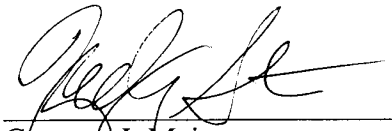

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